

Message

From: Raichel, Dan [draichel@nrdc.org]
Sent: 4/29/2021 10:02:46 PM
To: Messina, Edward [Messina.Edward@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]; Matuszko, Jan [Matuszko.Jan@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]; Pease, Anita [Pease.Anita@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; jsass@nrdc.org; Rhoads, Lucas [lrhoads@nrdc.org]
CC: Vogel, Dana [Vogel.Dana@epa.gov]; Nesci, Kimberly [Nesci.Kimberly@epa.gov]
Subject: Thank You and Follow Up on 4/21 Meeting
Attachments: Neonics CA Petition - FINAL 9.23.20.pdf; Request for Reconsideration of Insecticide Treated Seed Petition 12.22.20.pdf; Appendix for Request for Reconsideration of Neonic Treated Seed Petition 12.22.20.pdf

Dear All,

It was great connecting with everyone last week—thank you for taking the time. Circling a bit late, but we wanted to send along two quick follow ups:

- **California Petition** – As mentioned on the call, we’re sending along our petition to California’s Department of Pesticide Regulation along with a separate request for reconsideration (with appendix) after our initial petition was denied (attached). The two submissions outline the case for why we believe seeds treated with systemic pesticides do not constitute exempt “treated articles” and should be regulated accordingly. Although their focus is on California law and neonics specifically, we believe the arguments also have relevance to EPA’s consideration of this issue.
- **ESA Thoughts** – I reached out to a few other folks here on the ESA question, and we’re gathering some ideas re: interim protections during the effects determination/consultation process. It looks like it may take us a little bit to pull our thoughts together, but we’ll circle back when we do.

Thanks again, and if you have any questions or updates, please don’t hesitate to let us know.

Best,
Dan